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Attorneys for Defendants VeriSign, Inc. and m-Qube, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

BABAK PISHVAEE, individually, and on behalf of a class of similarly situated individuals,) Case No. C-07-3407-JW
Plaintiff,)
v.)
VERISIGN, INC., a California corporation,)
M-QUBE, INC., a Delaware corporation, and)
AT&T MOBILITY LLC, formerly known as)
Cingular Wireless LLC, a Delaware corporation,)
Defendant.)
DECLARATION OF ANGEL TANG PURSUANT TO CIVIL LOCAL RULE 7-11

1 DECLARATION OF ANGEL TANG PURSUANT TO CIVIL LOCAL RULE 7-11
2

3 I, Angel Tang, declare as follows:

4 1. I am a member of the Bar of the State of California and admitted to practice before
5 this Court. I am an associate in the firm of Arnold & Porter LLP, attorneys of record for VeriSign,
Inc. and m-Qube, Inc. ("VeriSign Defendants").

6 2. Pursuant to Civil Local Rule 7-11, counsel for the VeriSign Defendants contacted
7 counsel for the parties in the *Pishvae* and *Valdez* actions to assess whether they would agree that
8 the *Valdez* action is related to the *Pishvae* action within the meaning of Local Rule 3-12.

9 3. Counsel for Buongiorno USA, Inc., co-defendant in the *Valdez* action, advised
10 counsel for the VeriSign Defendants that Defendant Buongiorno does not take a position on the
11 VeriSign Defendants' Administrative Motion.

12 4. Counsel for Plaintiff in the *Valdez* action does not believe that the two actions are
13 related. Accordingly, a stipulation to the relief requested by this Administrative Motion could not
14 be obtained.

15 I declare under penalty of perjury of the laws of the United States of America that the
16 foregoing is true and correct.

17 Executed this 9th day of January, 2008 in Los Angeles, California.

18 Dated: January 9, 2008

19 ARNOLD & PORTER LLP

20 By: /s/ Angel L. Tang
Angel L. Tang (State Bar No. 205396)